



January 13, 2021

**VIA E-File**

Honorable Mark A. Hoyer  
Deputy Chief Administrative Law Judge  
Pennsylvania Public Utility Commission  
Piatt Place, Suite 220  
301 5th Avenue  
Pittsburgh, PA 15222  
[mhoyer@pa.gov](mailto:mhoyer@pa.gov)

Honorable Emily I. DeVoe  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Piatt Place, Suite 220  
301 5th Avenue  
Pittsburgh, PA 15222  
[edevoe@pa.gov](mailto:edevoe@pa.gov)

**Re: Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan**

Docket No. M-2020-3020824

Dear Judge Hoyer and Judge DeVoe,

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) files this Letter in response to the January 11, 2021 Interim Order in the above-referenced matter. In the that Interim Order, parties were required to file a response, if any, to the Joint Motion for Extension of Procedural Schedule and the Office of Administrative Law Judge's Proposed Revised Schedule by close of business today, Wednesday, January 13, 2021.

First, CAUSE-PA notes that it does not intend to file a formal Answer to the Joint Motion for Extension of Procedural Schedule, as we are a party thereto. We continue to assert that the compressed procedural schedule in this proceeding, and the sequencing of formal Notice, pleadings, and litigation identified in the Joint Motion for Extension of Procedural Schedule and outlined in Your Honors' Interim Order, present serious due process issues which must be fully addressed to prevent additional protracted litigation and appeal in this and the other pending Act 129 Phase IV proceedings.

Nevertheless, we file this Letter in response to the OALJ's Proposed Revised Schedule contained in the Interim Order. CAUSE-PA believes the alternative schedule proposed by the OALJ presents a possible path forward for litigation of these proceedings. However, we submit that this possible alternative would require alignment of all the parties to prevent the crux of CAUSE-PA's concern: the potential for protracted litigation and appeal which could substantially delay

the ultimate resolution of these proceedings. Without alignment of the parties, we are concerned that litigation will proceed on multiple tracts, at substantial expense to the Parties, to the Commission, and to ratepayers.

As Your Honors are aware, CAUSE-PA represents the interests of low income Pennsylvanians, and is without adequate resources to fully engage in the protracted litigation that may follow. Indeed, such litigation would present a true hardship for CAUSE-PA, and would undermine the ability of CAUSE-PA to defend the interests of its members to ensure that low income families have equitable access to comprehensive energy efficiency services.

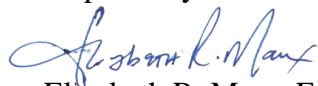
Should the parties align, and in light of the current procedural posture and the ongoing requirement that the Parties proceed with filing their Direct Testimony in this proceeding pursuant to the current litigation schedule, CAUSE-PA asserts that the Parties should likewise proceed with filing Rebuttal testimony on the original date established for Rebuttal testimony in this proceeding. Thereafter, we would propose the following supplemental litigation schedule and hearing dates:

<b>Rebuttal Testimony</b>	<b>January 20, 2021</b>
<b>Supplemental Direct</b>	<b>January 28, 2021</b>
<b>Supplemental Rebuttal</b>	<b>February 5, 2021</b>
<b>Hearing</b>	<b>February 9, 2021</b>
<b>Main Brief</b>	<b>February 18, 2021</b>
<b>Reply Comments/Revised Plan</b>	<b>March 1, 2021</b>
<b>Certification of the Record</b>	<b>March 2, 2021</b>

CAUSE-PA asserts that it would be prejudicial to the Parties to now suspend the original procedural schedule for the Company to file Rebuttal, given the Parties were ordered to proceed with filing their initial Direct Testimony in this proceeding by close of business today.

We continue to express our willingness and desire to work with Your Honors, the Parties, and the Company to reach an acceptable resolution to this unfortunate and complex procedural issue in a timely and expedient manner.

Respectfully Submitted,



Elizabeth R. Marx, Esq.

*Counsel for CAUSE-PA*

CC: Secretary Rosemary Chiavetta, via efile  
Chief Administrative Law Judge Charles Rainey, [crainey@pa.gov](mailto:crainey@pa.gov)  
Certificate of Service

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for :  
 Approval of its Act 129 Phase IV Energy : Docket No. M-2020-3020824  
 Efficiency and Conservation Plan :

**Certificate of Service**

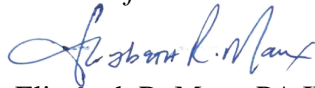
I hereby certify that I have this day served copies of the **Response of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) to the January 11, 2021 Interim Order** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54 and consistent with the Commission’s Emergency Order issued on March 20, 2020.

**VIA Email Only**

VIA EMAIL ONLY	
Devin T. Ryan, Esq. Post & Schell, PC 17 North Second Street 12 <sup>th</sup> Floor Harrisburg, PA 17101-1601 <a href="mailto:dryan@postschell.com">dryan@postschell.com</a>	Kimberly A. Klock, Esq. Michael J. Shafer, Esq. PPL Services Corporation Two North Ninth Street Allentown, PA 18101 <a href="mailto:kklock@pplweb.com">kklock@pplweb.com</a> <a href="mailto:mjshafer@pplweb.com">mjshafer@pplweb.com</a>
David B. MacGregor, Esq. Post & Schell, PC Four Penn Center 1600 John F. Kennedy Blvd Philadelphia, PA 19103-2808 <a href="mailto:dmacgregor@postschell.com">dmacgregor@postschell.com</a>	Steven C. Gray, Esq. Small Business Advocate Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, Pennsylvania 1710 <a href="mailto:sgray@pa.gov">sgray@pa.gov</a>
Aron J. Beatty, Esq. Office of Consumer Advocate 555 Walnut Street 5 <sup>th</sup> floor, Forum Place Harrisburg, PA 17101-1923 <a href="mailto:abeatty@paoca.org">abeatty@paoca.org</a>	Joseph L. Vullo, Esq. Burke, Vullo, Reilly, Roberts 1460 Wyoming Ave. Forty Fort, PA 18704 <a href="mailto:jlvullo@aol.com">jlvullo@aol.com</a>
Judith D. Cassel, Esq. Micah R. Bucy, Esq. Hawke, McKeon & Sniscak, LLP 100 North Tenth Street Harrisburg, PA 17105-1778 <a href="mailto:jdcassel@hmslegal.com">jdcassel@hmslegal.com</a> <a href="mailto:mrbcy@hmslegal.com">mrbcy@hmslegal.com</a>	Mark Szybist, Esq. Natural Resources Defense Council 1152 15 <sup>th</sup> Street NW Suite 300 Washington, DC 20005 <a href="mailto:mszybist@nrdc.org">mszybist@nrdc.org</a>

James M. Van Nostrand, Esq. Keyes & Fox LLP 320 Fort Duquesne Blvd. Suite 15K Pittsburgh, PA 15222 <a href="mailto:jvannostrand@keyesfox.com">jvannostrand@keyesfox.com</a>	
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Respectfully Submitted,  
**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



Elizabeth R. Marx, PA ID 309014  
118 Locust Street  
Harrisburg, PA 17101  
717-236-9486  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

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